



Geotechnical
Environmental
Water Resources
Ecological

April 6, 2011
Project 09339-0

Ms. Kimberly Tisa
U.S. Environmental Protection Agency – Region I
5 Post Office Square, Suite 100
Boston, MA 02109

Dear Ms. Tisa:

**Re: Addendum to Risk-Based Cleanup Plan
Allied Veterans Memorial Pool
65 Elm Street
Everett, Massachusetts**

GEI Consultants, Inc., on behalf of the Massachusetts Department of Conservation and Recreation (DCR), is submitting this Addendum to the Risk-Based Cleanup Plan (RBCP) dated February 18, 2011 for the Allied Veterans Memorial Pool located at 65 Elm Street in Everett, Massachusetts (the Site). The purpose of this Addendum is to clarify an apparent discrepancy between polychlorinated biphenyl (PCB) concentrations found in decking caulking and decking concrete and to increase the scope of proposed long-term monitoring activities to include wipe sampling of the pool painted surface.

PCB Concentrations in Caulking vs. Decking Concrete

As documented in the RBCP, in October 2009 GEI collected three caulking samples from the expansion joints within the originally-installed decking surrounding the main pool. PCB concentrations in the caulking samples ranged from non-detect to 30.6 parts per million (ppm). We also collected two caulking samples from the expansion joint between the originally installed decking and the bath house. PCB concentrations in those samples were 226 ppm and 228 ppm.

Between October 2009 and September 2010, we collected concrete samples from the originally-installed decking surrounding the main pool. Seventy-six of the concrete samples were collected at a distance of 0 to 1-inch from the caulked expansion joint. PCB concentrations in the concrete samples ranged from non-detect to 49.5 ppm. We also collected concrete samples from the originally-installed decking in front of the bath house. Three of the samples were collected at a distance of 0.5 to 1.5-inch from the joint, and PCB concentrations in those samples ranged from non-detect to 40.6 ppm.

In a telephone conversation with you on March 17, 2011, you asked about the apparent discrepancy between a maximum PCB concentration of 30.6 ppm in the decking caulking as compared with a maximum PCB concentration of 49.5 ppm in the decking concrete. The reason for this apparent discrepancy is that DCR performs maintenance on the pool, including removing and replacing caulking in expansion joints, as needed. The pool was originally constructed in the late 1960's. Over the years, DCR has removed and replaced caulking in the decking expansion joints on an as needed basis and only those areas of caulking exhibiting wear and tear are

replaced. Therefore, the caulking that was present in the joints at the time of sampling consisted of several different generations of caulking. It is possible that with the exception of the caulking in the joint in front of the bath house, that none of the original caulking that likely had higher concentrations of PCBs was present in the decking joints at the time of sampling.

Long-Term Monitoring – Main Pool Painted Surface

As described in the RBCP, the paint coating the main pool is an excluded product as defined in 40 CFR 761.3. Therefore, in accordance with 40 CFR 761.20 authorization is not required to use excluded PCB products or those items whose surfaces have come into contact with excluded PCB products. However, DCR plans to incorporate monitoring for PCBs of the painted surface of the main pool as follows:

- Monitoring of the main pool surface will consist of annual wipe sampling for PCBs. Wipe samples will be collected in April prior to pool opening and prior to filling the pool with water. A total of up to four samples (two from the floor and two from the walls) will be collected from a 100 square centimeter (cm^2) area using the standard wipe test method defined in 40 CFR 761.123. The samples will be submitted to a laboratory for extraction by EPA Method 3540C and analysis for PCBs by EPA Method 8082.
- In the event PCB concentrations in a wipe sample are greater than 1 microgram per 100 square centimeters ($\mu\text{g}/100 \text{ cm}^2$), DCR will apply an additional coat of paint over the area of the pool surface represented by the sample that exceeded $1 \mu\text{g}/100 \text{ cm}^2$. Following application of the additional coat of paint, we will collect a wipe sample of the area to verify the effectiveness of the coating.

If you have any questions, please contact Leslie Lombardo at llombardo@geiconsultants.com or 781-721-4016, or me at igladstone@geiconsultants.com or 781-721-4012.

Sincerely,

GEI CONSULTANTS, INC.



ileen S. Gladstone, P.E., LSP, LEED AP
Vice President

LAL/ISG:csh

c: Robert Lowell, DCR

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